

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

IN RE:	§	
BORDER ANESTHESIA PC,	§	
	§	<b>Civil Action No. 1:10-cv-00020</b>
Debtor	§	
	§	
MICHAEL B. SCHMIDT, TRUSTEE OF	§	
THE ESTATE OF BORDER ANESTHESIA	§	
SERVICES, P.C. and REGINALD BERRY,	§	
	§	
Plaintiff,	§	
	§	
vs.	§	<b>Consolidated Adversary No. 07-02098</b>
	§	
DOUGLAS MCKEE, INDIVIDUALLY and	§	
d/b/a DOUGLASS C. MCKEE, CRNA, P.C.,	§	
VIJI ROBERTS, INDIVIDUALLY and d/b/a	§	
VIJI ROBERTS ANESTHESIA, CRNA,	§	
P.C., MARY WEATHERS, MARTIN	§	
POWERS, INDIVIDUALLY and d/b/a	§	
POWERS ANESTHESIA SERVICES, P.C.	§	
WILLIAM T. GRADY, JR., WILLIAM	§	
WRENCH and EVELYN WILLIAMS,	§	
COLUMBIA VALLEY HEALTHCARE	§	
SYSTEM, L.P., d/b/a VALLEY REGIONAL	§	
MEDICAL CENTER and RIO GRANDE	§	
ANESTHESIOLOGISTS, PA	§	
	§	
Defendants.	§	

**DEFENDANT COLUMBIA VALLEY HEALTHCARE SYSTEM, L.P. D/B/A VALLEY  
REGIONAL MEDICAL CENTER’S EXPERT DISCLOSURES**

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure, Defendant Columbia Valley Healthcare System, L.P. d/b/a Valley Regional Medical Center (“VRMC”) hereby discloses the identity of the following witnesses it may use at trial to present evidence under Federal Rule of Evidence 702, 703 or 705:

- (1) Thomas R. McCarthy, Ph.D; and
- (2) Ramsey Shehadeh, Ph.D.

Pursuant to Fed. R. Civ. P. 26(a)(2)(B), VRMC has served or will serve on all parties an expert report for each of the above witnesses, in the manner set forth in a certificate of service separately filed with the Court today.

In addition, VRMC may use at trial to present evidence under Federal Rule of Evidence 702, 703 or 705 any witness disclosed for such purpose by any co-defendant or other party to this action, including without limitation the following witnesses identified by counsel for defendants McKee, Grady, Wrench and Williams:

- (1) Billy R. Bradford, Jr., CPA;
- (2) Tom W. Sarytchoff, CPA; and
- (3) Ygnacio D. Garza, CPA.

Expert reports for these three witnesses are already in the plaintiffs' possession and may also be disclosed and/or produced today by counsel for defendants McKee, Grady, Wrench and Williams. VRMC cross-designates and discloses those reports for purposes of Rule 26(a)(2).

DATED: November 30, 2011

Respectfully submitted,

s/ Margaret M. Zwisler  
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**ATTORNEYS FOR DEFENDANT  
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MEDICAL CENTER**

**CERTIFICATE OF SERVICE**

On November 30, 2011, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Southern District of Texas, Brownsville Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. Additionally, the following parties have been served via *First Class Mail*:

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